

EXHIBIT 2

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE: GOOGLE DIGITAL ADVERTISING
ANTITRUST LITIGATION

No. 1:21-md-3010 (PKC)

This Document Relates To:

MICHAEL STELLMAN,

Plaintiff,

v.

GOOGLE LLC ET AL.,

Defendant.

No. 1:23-cv-01532 (PKC)

**PLAINTIFF MICHAEL STELLMAN'S RESPONSES AND OBJECTIONS TO
DEFENDANTS GOOGLE LLC AND ALPHABET INC.'S
FIRST SET OF INTERROGATORIES**

RESPONSE TO INTERROGATORY NO. 5

Plaintiff Stellman objects to this Interrogatory on the grounds that it contains at least five discrete subparts and, together with other Interrogatories, may exceed the limitation of permissible Interrogatories, including discrete subparts under Rule 33 of the Federal Rules of Civil Procedure. Plaintiff Stellman objects to this Interrogatory on the grounds that it seeks information in the possession of and more easily accessible to Google.

Subject to and without waiving the General Objections and foregoing objections, Plaintiff Stellman answers this Interrogatory based on information presently available to him and within his possession, custody, and control:

Plaintiff Michael Stellman

Michael Stellman used one Google Digital Advertising Account:

- [REDACTED]
- Opened on January 29, 2008
- In use from January 29, 2008 to the present
- Michael Stellman owned the account
- Michael Stellman accessed the account from January 29, 2008 through the present
- [REDACTED] accessed the account from approximately 2023 through approximately 2024
- [REDACTED] accessed the account from approximately 2023 through approximately 2024